

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

EMMA GIACOMO, by and through her
son and next friend, GEORGE ALFORD,

Plaintiff,

v.

BEVERLY ENTERPRISES-ALABAMA,
INC., et al.,

Defendants.

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Civil Action No.: 3:08-CV-19 WKW

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW the Plaintiff and hereby moves this Court for an Order extending the deadline contained in the February 11, 2008 Order for Plaintiff to respond to Defendant's Motion to Compel Arbitration and Stay Proceedings.

1. The Court's February 11, 2008 Order gave the deadline that Plaintiff must respond to Defendant's Motion to Compel Arbitration and Stay Proceedings on or before February 28, 2007.

2. The parties are working to resolve the issues of pending motions among themselves without the court's involvement.

3. Plaintiff requests an additional fourteen (14) days to reply to Defendant's Motion to Compel Arbitration and Stay Proceedings in the event that the attempt to resolve this motion is unsuccessful.

WHEREFORE, PREMISES CONSIDERED, plaintiff prays that this Court will enter an Order extending the deadline in the February 11, 2008 Order for fourteen (14) days.

/s/ David J. Hodge
DAVID J. HODGE
Of Counsel for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of February, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: All counsel of record.

I hereby further certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

W. Benjamin Broadwater, Esq.
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/s/David J. Hodge
Of Counsel for Plaintiff